

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION) MDL No. 1:13-md-2419-RWZ
)
This Document Relates to:)
All Cases)
)

**NOTICE OF FILING OF JOINT NEW ENGLAND
COMPOUNDING CENTER, INC. CHAPTER 11 PLAN**

Paul D. Moore, Chapter 11 Trustee (the “Trustee”) of New England Compounding Center, Inc. (“NECC”), and the Official Committee of Unsecured Creditors of NECC (the “Committee”, and together with the Trustee, the “Plan Proponents”), hereby give notice of the *Joint Chapter 11 Plan of New England Compounding Pharmacy, Inc.* (the “Plan”) filed in the United States Bankruptcy Court for the District of Massachusetts (the “Bankruptcy Court”) on December 3, 2014.

For the convenience of parties, copies of the Plan and the related disclosure statement (the “Disclosure Statement”) are attached hereto as Exhibits A and B, respectively. The Plan and Disclosure Statement remain subject to further revision, and neither of them have been approved or reviewed by the Bankruptcy Court. Under applicable law, acceptance or rejection of such Plan cannot be solicited, and is not hereby solicited, by the Plan Proponents, absent prior approval by the Bankruptcy Court.

Dated: December 4, 2014

By their attorneys,

/s/ Michael R. Gottfried

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Certificate of Service

I, Michael R. Gottfried, hereby certify that on this day, December 4, 2014, I caused a copy of the foregoing document, which was filed using this Court's ECF system, to be served electronically upon those parties registered to receive ECF service.

/s/ *Michael R. Gottfried*

Michael R. Gottfried